

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

In re:

BSPV-PLANO, LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 22-40276 (BTR)

**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND PLEADINGS**

**PLEASE TAKE NOTICE THAT** the undersigned hereby appears as counsel for The Huntington National Bank, trustee (the “**Trustee**”), in the above-referenced bankruptcy case. Such counsel hereby enters their appearance under § 1109(b) of the United States Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and such counsel hereby requests, under Bankruptcy Rules 2002, 3017 and 9007 and §§ 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon them at the following:

Frances A. Smith  
State Bar No. 24033084  
**ROSS & SMITH, P.C.**  
700 North Pearl, Suite 11610  
Dallas, TX 75201  
Telephone: 214-377-7879  
Facsimile: 214-377-9409  
Email: frances.smith@judithwross.com

**PLEASE TAKE FURTHER NOTICE THAT**, under § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is (3228). The Debtor’s address for notices is: 4851 Keller Springs Road 209, Addison, Texas 75001.

or conveyed by mail, hand delivery, telephone, telecopy, email, or otherwise filed or made with regard to the referenced cases and proceedings herein with respect to (1) that affects or seeks to affect in any way, any rights or interests of any creditor or party of interest in this case, with respect to: a) the debtor; b) property of the estate, or proceeds thereof in which the alleged debtor may claim an interest; or c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by Trustee.

**PLEASE TAKE FURTHER NOTICE THAT**, neither this Notice of Appearance nor any former or later appearance, pleading, claim or suit will waive (1) Trustee's right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) Trustee's right to trial by jury in any proceeding in these cases or any case, controversy, or proceeding related to these cases, (3) Trustee's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, action, defenses, including defenses to jurisdiction, setoffs, or recoupment's to which Trustee may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Trustee expressly reserves.

Dated: March 5, 2022

By: /s/ Frances A. Smith

Judith W. Ross

State Bar No. 21010670

Frances A. Smith

State Bar No. 24033084

Eric Soderlund

State Bar No. 24037525

Jessica Lewis

State Bar No. 24060956

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*Co-Counsel for The Huntington National Bank, as  
Trustee*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 5<sup>th</sup> day of March 2022, I caused to be served a true and correct copy of the above and foregoing document via the Court's ECF filing system and/or U.S. mail as indicated in the attached Master Service List.

/s/ Frances A. Smith

Frances A. Smith

**Master Service List**  
**BSPV-Plano, LLC**  
**Case No. 22-40276**

**Debtor:**

BSPV-Plano, LLC  
4851 Keller Springs Rd., #209  
Addison, TX 75001  
**Served via U.S. mail**

**Debtor's Counsel:**

Munsch Hardt Kopf & Harr  
Attn: Thomas Daniel Berghman  
Davor Rukavina  
500 N. Akard, Ste. 3800  
Dallas, TX 75201-6659  
Phone: 214-855-7554  
Fax: 214-978-4346  
Email: tberghman@munsch.com  
drukavina@munsch.com  
**Served via ECF**

Munsch Hardt Kopf and Harr PC  
Attn: Thanh Nguyen  
Jay H. Ong  
1717 West 6th Street, Suite 250  
Austin, TX 78703  
Phone: 512-391-6100  
Fax: 512-391-6149  
Email: anguyen@munsch.com  
jong@munsch.com  
**Served via ECF**

**U.S. Trustee:**

Office of the U.S. Trustee  
110 N. College Ave., Suite 300  
Tyler, TX 75702  
Phone: 903-590-1450  
Email: ustpreion06.ty.ecf@usdoj.gov  
**Served via ECF**

**20 Largest Creditors:**

AGES Service Company, Inc.  
1080 S. Kimball Ave., Ste. 150  
Southlake, TX 76092  
**Served via U.S. mail**

American Arbitration Association  
120 Broadway, 21<sup>st</sup> Fl.  
New York, NY 10271  
**Served via U.S. mail**

Centex Skilled Trades, LLC  
1813 Ann and Dossy Ct.  
Crowley, TX 76036  
**Served via U.S. mail**

Civil Point Engineers  
9101 LBJ Frwy., Ste. 300  
Dallas, TX 75243  
**Served via U.S. mail**

Dalworth Framing Corp.  
4817 Worth St.  
Dallas, TX 75246  
**Served via U.S. mail**

JM Lawncare & Sprinkler, LLC  
806 Jennifer Ct.  
Highland Village, TX 75077  
**Served via U.S. mail**

Landstar Excavation Inc.  
P. O. Box 293838  
Lewisville, TX 76247  
**Served via U.S. mail**

Miguel Hernandez  
1508 Indiana Ct.  
Irving, TX 75060  
**Served via U.S. mail**

Oldham Lumber Company  
8738 Forney Rd.  
Dallas, TX 75227  
**Served via U.S. mail**

Paradis Brothers Construction Inc.  
450 Cherry Ln.  
Southlake, TX 75092  
**Served via U.S. mail**

TXU Energy  
P. O. Box 650638  
Dallas, TX 75265-0638  
**Served via U.S. mail**

Ranger Fire, Inc.  
1000 S. Main St., Ste. 150  
Grapevine, TX 76051  
**Served via U.S. mail**

Zais Companies  
P. O. Box 1403  
Decatur, TX 76234  
**Served via U.S. mail**

Regent Construction  
1107 E 1st St.  
Fort Worth, TX 76102  
**Served via U.S. mail**

Republic Services #615  
551 Huffines Blvd.  
Lewisville, TX 75056  
**Served via U.S. mail**

Slates Harwell LLP  
1700 Pacific Ave., Ste. 3800  
Dallas, TX 75201  
**Served via U.S. mail**

Southwest Enclosure Systems, Inc.  
1438 Crescent Dr., #104  
Carrollton, TX 75006  
**Served via U.S. mail**

Terry's Portable Welding  
106 E. Pioneer  
Irving, TX 75061  
**Served via U.S. mail**

Trinia Zais  
P. O. Box 1403  
Decatur, TX 76234  
**Served via U.S. mail**

Trusted Mechanical Services  
7665 Dick Price Rd.  
Mansfield, TX 76063  
**Served via U.S. mail**